

1 EDMUND G. BROWN JR.  
Attorney General of California  
2 KAREN B. CHAPPELLE  
Supervising Deputy Attorney General  
3 ANTONIO LOPEZ, JR.  
Deputy Attorney General  
4 State Bar No. 206387  
300 So. Spring Street, Suite 1702  
5 Los Angeles, CA 90013  
Telephone: (213) 897-2536  
6 Facsimile: (213) 897-2804  
*Attorneys for Complainant*

7  
8 **BEFORE THE**  
**BOARD OF REGISTERED NURSING**  
9 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

10 In the Matter of the Accusation Against:

Case No. *2011-375*

11 **KELECHI UGONNA OLUKAIKPE**  
12 **1400 Barton Road, Apt. # 1614**  
13 **Redlands, CA 92373**

**A C C U S A T I O N**

14 **Registered Nurse License No. 585703**

15 Respondent.

16  
17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.E.D., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Interim Executive Officer of the Board of Registered Nursing ("Board"),  
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about August 16, 2001, the Board issued Registered Nurse License Number  
24 585703 to Kelechi Ugonna Olukaikpe ("Respondent"). The registered nurse license was in full  
25 force and effect at all times relevant to the charges brought herein and will expire on June 30,  
26 2011, unless renewed.

27 ///

28 ///

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

- 2
- 3
- 4
- 5

6  
7  
8  
9

10

11

12  
13

14

15  
16  
17

## 18

19  
20  
21  
22

## 23

## 2.4

25  
26  
27

8. On or about April 23, 2004, pursuant to a Order of the Board, in the disciplinary action entitled *In the Matter of Permanent Certificate Number 681955 Issued to Kelechi Ugonna Olukaikpe*, the Texas Board issued a Suspension of Respondent's nursing license.

9. The Texas Board based its Order on the following facts:

a. On or about March 25, 2002, Respondent was employed as an RN at Town Estates Nursing Home located in the city of Keene, Texas;

b. On or about March 25, 2002, Respondent failed to document an assessment of the elements and signs of death that influenced her decision not to initiate cardiopulmonary resuscitation on a resident who had cerebral palsy, and was found unresponsive. The resident subsequently died.

c. The Texas Board filed formal administrative charges against Respondent based on the incident described above and set the matter for a hearing. Respondent failed to appear for the hearing.

## SECOND CAUSE FOR DISCIPLINE

**(Unprofessional Conduct)**

10. Respondent is subject to discipline under Code section 2761, subdivision (a), on the grounds of unprofessional conduct, Respondent committed acts constituting unprofessional conduct, as more particularly set forth in paragraphs 7 through 9, above.

## PRAYER

WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged, and that following the hearing, the Board of Registered Nursing issue a decision:

1. Revoking or suspending Registered Nurse License Number 585703, issued to Kelechi Ugonna Olukaikpe;

2. Ordering Kelechi Ugonna Olukaikpe to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement of this case, pursuant to Business and Professions Code section 125.3; and,

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

3. Taking such other and further action as deemed necessary and proper.

DATED: October 25, 2010 Louise R. Bailey  
LOUISE R. BAILEY, M.E.D., RN  
Interim Executive Officer  
Board of Registered Nursing  
Department of Consumer Affairs  
State of California  
*Complainant*

LA2010601013